

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DUMBO MOVING & STORAGE, INC.,

Plaintiff,

v.

PIECE OF CAKE MOVING & STORAGE LLC,
SIMPLY MOVING LLC, SIMPLY MOVING &
STORAGE LLC, VOJIN POPOVIC, STEFAN
MARCALI and VOLODYMYR PLOKHYKH,

Defendants.

Case No. 22-CV-05138 (ER)

STIPULATED PROPOSED REVISED DISCOVERY SCHEDULE AND ORDER

WHEREAS Plaintiff retained new counsel who filed an appearance on April 28, 2025, which filing lifted the stay of all proceedings pending Plaintiff obtaining new counsel;

WHEREAS counsel for the parties having met and conferred on May 2, 2025 to discuss and agree upon a revised schedule;

IT IS HEREBY STIPULATED AND AGREED by and between counsel for all parties that the discovery schedule shall be amended as follows:

Task	Current Deadline	Proposed Deadline
Exchange of source code and operational software	February 14, 2025	May 30, 2025
Production of documents in response to previously served document requests and subpoena to Hebronsoft	n/a	May 30, 2025
Interim Status Conference re Source code/software discovery etc. (as needed)	March 19, 2025	July 16, 2025
Last day to Serve Further Interrogatories and Document Requests	July 1, 2025	October 1, 2025
Last day to Serve Requests to Admit	July 1, 2025	October 1, 2025
Last day to complete Non-Expert Depositions and All Fact Discovery	August 26, 2025	December 12, 2025

Expert Reports	September 30, 2025	January 16, 2026
Rebuttal Reports	November 25, 2025	March 13, 2026
Last to complete Expert Depositions	December 23, 2025	April 17, 2026
All Discovery Completed	December 23, 2025	April 17, 2026
Case Management Conference	T/B/D after December 23, 2025	T/B/D after April 17, 2026

DATED: May 5, 2025

Attorneys for Plaintiff Dumbo Moving & Storage, Inc.

By: 

Avram E. Frisch

THE LAW OFFICE OF AVRAM E. FRISCH LLC

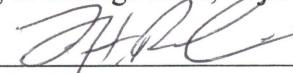
One University Plaza Suite 119

Hackensack, New Jersey 07601

201-289-5352

Frischa@avifrischlaw.com

Attorneys for Defendants, Piece of Cake Moving & Storage LLC, Simply Moving LLC, Simply Moving & Storage LLC, Vojin Popovic, and Stefan Marcali

By: 

Fred H. Perkins

MORRISON COHEN LLP

909 Third Avenue

New York, NY 10022

212-736-8600

fhperkins@morrisoncohen.com

Attorneys for Defendant Volodymyr Plokhykh

By: _____

Oleg A. Mestechkin

Wing K. Chiu

MESTECHKIN LAW GROUP P.C.

1733 Sheepshead Bay Road, Suite 29

Brooklyn, NY 11235

Tel. (212) 256-1113

Fax. (646) 365-2069

om@lawmlg.com

wkc@lawmlg.com

IT IS SO ORDERED.

DATED: _____

Hon. Edgardo Ramos
United States District Judge

Expert Reports	September 30, 2025	January 16, 2026
Rebuttal Reports	November 25, 2025	March 13, 2026
Last to complete Expert Depositions	December 23, 2025	April 17, 2026
All Discovery Completed	December 23, 2025	April 17, 2026
Case Management Conference	T/B/D after December 23, 2025	T/B/D after April 17, 2026

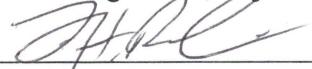
DATED: May 5, 2025

Attorneys for Plaintiff Dumbo Moving & Storage, Inc.

By: _____

Avram E. Frisch
THE LAW OFFICE OF AVRAM E. FRISCH LLC
One University Plaza Suite 119
Hackensack, New Jersey 07601
201-289-5352
Frischa@avifrischlaw.com

Attorneys for Defendants, Piece of Cake Moving & Storage LLC, Simply Moving LLC, Simply Moving & Storage LLC, Vojin Popovic, and Stefan Marcali

By: 
Fred H. Perkins
MORRISON COHEN LLP
909 Third Avenue
New York, NY 10022
212-736-8600
fhperkins@morrisoncohen.com

Attorneys for Defendant Volodymyr Plokhykh

By: 
Oleg A. Mestechkin
Wing K. Chiu
MESTECHKIN LAW GROUP P.C.
1733 Sheepshead Bay Road, Suite 29
Brooklyn, NY 11235
Tel. (212) 256-1113
Fax. (646) 365-2069
om@lawmlg.com
wkc@lawmlg.com

IT IS SO ORDERED.

DATED: _____

Hon. Edgardo Ramos
United States District Judge